

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

POSTAL RATE AND FEE CHANGES
PURSUANT TO PUBLIC LAW 108-18

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: Docket No. R2005-1
:
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INTERROGATORIES OF ADVO INC. TO UNITED STATES POSTAL
SERVICE WITNESS DENNIS STEVENS (ADVO-USPS-T15-9)

(May16, 2005)

Pursuant to sections 25 and 26 of the Rules of Practice, ADVO, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Dennis Stevens (USPS-T-15). If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,

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ADVO, INC. INTERROGATORIES TO USPS WITNESS DENNIS STEVENS

ADVO/USPS-T15-9. With respect to LR-K-79, please confirm the following. If you cannot confirm, please explain why not, and provide the correct information.

- (a) The number of zip-route-day observations in COSTPOOL2.FINAL.XLS is the same as were used to develop MDCD.CPSUM.FINAL.DATA.XLS.
- (b) The masked zip codes in MDCD.WEIGHTS.MASKZIPS.DATA match those in COSTPOOL2.FINAL.XLS, and the weights in the former can be applied to the activity times (of the matched zip codes) in the latter file to provide population estimates of such times by delivery mode.
- (c) The population estimates developed from (b) above will match those in MDCD.CPSUM.FINAL.XLS.

ADVO/USPS-T15-10. Please confirm that the observations from witness Bradley's TIMEPOOLMDATA.PRN file (LR-K-81) are the same observations found in COSTPOOL2.FINAL.XLS, with the exception that the zip code identifiers have changed. If you cannot confirm, please explain why not.